

7-27-92
12.3.8v.6

ASH GROVE CEMENT

Date: July 27, 1992

To: General Distribution

From: Mike Hrizuk

Subject: Waste Handling and Disposal Policy

You will find attached a policy outlining the handling and disposal of wastes generated on site. Whatever arrangements need to be made to comply with this policy should be made within the next two weeks as this policy is in effect immediately. Please, review this policy with your people at your earliest convenience. If you have any questions, please feel free to contact me.

Thank You

Mike



AGC2E000024

ASH GROVE CEMENT

Date: May 19, 1992

To: General Distribution

From: Mike Hrizuk

Subject: Handling and Disposal of Wastes Generated On Site

Recently, I received a letter from the DEQ regarding reduction of toxic and hazardous wastes generated in our facility. Since, we are a conditionally exempt small quantity generator, we will not be required to submit a plan to reduce the use of toxic and /or hazardous materials to the DEQ at this time. However, it is in our best interest and the environments to look seriously at waste reduction as well as to ensure the proper disposal of wastes generated at our facility.

It is our policy to use environmentally safe chemicals in our facility whenever possible. Please, work with Ron Edge and your vendors for your specific needs, so that safe alternatives can be used whenever possible. However, we will continue to generate a small quantity of material classified as hazardous waste and the following paragraphs describe procedures we should adhere to when dealing with those generated waste streams.

In the following paragraphs you will also find guidelines for dealing with the every day wastes streams generated at our facility.

In the next few weeks, we will begin closure of our landfill. We will not construct a new landfill. Therefore, all of the waste generated on site will either be destroyed in the cement kiln, hauled to the landfill for disposal or hauled from the plant site for recycling.

QUARRY

Dust and Dirt:

It is the nature of our process that a certain amount of dirt and dust will be generated. This material is to be returned to the process stream whenever possible. Clean up dirt and dust may be returned to the process via the cement rock pile. All clean up material should be properly disposed of in this pile, being careful to exclude any iron or steel scraps.

Paper and Food Wastes:

Paper and food wastes will be stored in their proper waste receptacles which should be marked "TRASH". Food wastes must be stored in covered containers until they are hauled to the trash trailer for disposal in the landfill. The trash receptacle should be emptied into the garbage trailer parked in the plant at least weekly or as needed.

Paper and food wastes will be hauled to Baker on a weekly basis or as needed.

Wood:

Wood waste should be stored at the plant waste dump until a sufficient amount is gathered to apply for a burning permit from DEQ. Doug Hale should be contacted regarding the process by which a burning permit is obtained.

Steel and Metal Scrap:

Scrap steel should be taken to the designated storage area until it can be hauled from the plant site for recycling. We will be contracting with R&S Davis Recycling to haul all steel scrap from the plant on a periodic basis. Initially, we will mount a clean up drive to gather as much of the existing scrap for recycling as possible. Davis Recycling will take all metals, including barrels as long as they have been cleaned according to our procedure set forth under the upcoming heading "Oily Wastes".

Oily Wastes:

This category includes oil filters, greasy or oily rags, grease drums, oil drums, floor dry oil absorbent, Aerosol spray cans. Note: all oily wastes should be stored in covered containers.

Oil Filters: should be stored in one of two (2) 1/4 barrel containers designated specifically for "OIL FILTERS". The filters will be hauled to the plant weekly and placed in the designated area for "WASTE DISPOSAL". The empty 1/4 barrel will be picked up when a full 1/4 barrel is brought to the staging area.

A monthly report, as to the quantity of filters disposed from the quarry, should be submitted on the attached form.

Oily, Greasy Rags: Should be stored in receptacles placed in the New Quarry Shop, Old Quarry Shop, Lube Shop, and quarry proper which are marked "RAGS". All rag containers should be emptied into one of two (2) receptacles weekly or as necessary and brought to the plant. The rags should be placed in the area specifically designated "WASTE DISPOSAL".

A monthly report should be submitted, as to the quantity of rags disposed from the quarry, on the attached form.

Oil Drums: in all cases an effort should be made to have the oil company pick up empty oil drums. If this is not possible, an alternate method of disposal would be as follows:

- 1.) Drain empty oil drum into an approved container for disposal.
- 2.) clean drum out with diesel fuel or hot water to remove oil residue, placing residue in an approved container.
- 3.) store empty drum in the area designated "Empty Drums".
- 4.) when a quantity of drums are obtained they should be crushed and placed in the designated "Scrap Metal" area.

A monthly report should be submitted, as to the quantity of oil drums disposed from the quarry, on the attached form.

Grease Drums: in all cases an effort should be made to have the oil company pick up empty grease drums or order drums with liners. If this is not possible, an alternate method of disposal would be as follows:

- 1.) clean the grease drum with rags and solvent and place rags and diesel fuel residue into an approved container for disposal.
- 2.) store empty drum in the area designated "Empty Drums".
- 3.) when a 10 or more drums have accumulated they should be crushed and placed in the designated "Scrap Metal" area.

A monthly report should be submitted, as to the quantity of grease drums disposed from the quarry, on the attached form.

Floor Dry, Oil Absorbent Materials: should be stored in a 1/4 barrel container labeled "Oily Residue". Each container should be brought to the plant and placed in the area designate "Waste Disposal". This material will be disposed of in the kiln.

A monthly report should be submitted, as to the quantity of floor dry and absorbent material disposed from the quarry, on the attached form.

Aerosol Containers: this category includes belt dressing cans, paint cans, etc. Every effort should be made to find an environmentally safe alternative product that doesn't use an aerosol spray. However, if no suitable substitutes exist and it is necessary to use an aerosol, the can when empty should be placed in the container labeled "TRASH". This will be handled according to the guideline established under Paper and food wastes.

A monthly report should be submitted, as to the quantity of aerosol cans disposed, on the attached form.

Solvent Wastes:

Mineral Spirits and Solvents, "liquid hazardous waste": all non-chlorinated hazardous waste such as mineral spirits and solvent, etc. should be placed in the proper holding tank [will probably be a small tank mounted on a trailer versus using the old water truck] emptied periodically into the waste oil tanks located east of the gas house.

A monthly report should be submitted, as to the quantity of oils and solvents disposed, on the attached form.

Chlorinated Hazardous Wastes: It is our policy to eliminate the use of any chlorinated solvents used at our facility, however should residual material be on site it should be stored in a suitable container which is specifically labeled as to the content of material and arrangements should be made to ship it to an approved waste facility for disposal. Arrangements should be made through Doug Hale.

A monthly report should be submitted, as to the quantity of chlorinated wastes generated or disposed, on the attached form.

PLANT

Dirt and Dust:

This would include any material escaping the process such as clinker or raw feed. All of these materials should be transported to the secondary crusher where they will be added back to the process stream.

Landscaping Wastes:

Landscaping wastes [tree limbs, grass, vegetation] should be hauled to the designated composting area and put on the compost pile. This material will be reincorporated into the garden.

Janitorial Wastes:

Cleaning solution used by the janitors should be biodegradable and non caustic wherever possible. Caustic wastes should be neutralized before being put into the septic system.

Lab Wastes:

Acidic and basic solutions should be neutralized before being put into the septic system.

Paper and Food Wastes:

Paper and food wastes will be stored in their proper waste receptacles which should be marked "TRASH". Food wastes must be stored in covered containers until they are hauled to the trash trailer for disposal in the landfill. The trash receptacle should be emptied into the garbage trailer parked in the plant at least weekly or as needed.

Paper and food wastes from the plant and quarry will be hauled to the Baker County Landfill on a weekly basis or as needed.

Wood:

Wood waste should be stored at the plant waste dump until a sufficient amount is gathered to apply for a burning permit from DEQ. Doug Hale should be contacted regarding the process by which a burning permit is obtained.

Steel and Metal Scrap:

Scrap steel should be taken to the designated storage area until it can be hauled from the plant site. Grinding balls from both finish and raw mills shall be stored in barrels in their designated area until they can be removed from the plant site for recycling.

Material from the ball trap should be screened and the steel stored with the used grinding balls until recycled. The rock and dirt may be returned to the secondary crusher for reintroduction into the process stream.

We will be contracting with R&S Davis Recycling to haul all steel scrap from the plant on a periodic basis. Initially, we will mount a clean up drive to gather as much of the existing scrap for recycling as possible. Davis Recycling will take all metals, including barrels as long as they have been cleaned according to our procedure set forth under the upcoming heading "Oily Wastes".

Kiln Brick and Refractory:

All Brick removed from the kiln, preheater or cooler tubes shall be hauled to the secondary crusher pad for storage, until they can be recycled back into the process stream through the secondary crusher.

Oily Wastes:

This category includes oil filters, greasy or oily rags, grease drums, oil drums, floor dry oil absorbent, Aerosol spray cans.
Note: all oily wastes should be stored in covered containers.

Oil Filters: should be stored in one of two (2) 1/4 barrel containers designated specifically for "OIL FILTERS". The filters will be hauled to the plant weekly and placed in the designated area for "WASTE DISPOSAL". The empty 1/4 barrel will be picked up when a full 1/4 barrel is brought to the staging area. The filters from both the Quarry and plant should be burned on a weekly basis. Burning will take place by introducing the filters into the kiln at the feed hood.

A monthly report, as to the quantity of filters from the plant disposed, should be submitted on the attached form.

Oily, Greasy Rags: Should be stored in receptacles placed in the Shop, and general plant area which are marked "RAGS". All rag containers should be emptied into one of two (2) receptacles weekly or as necessary and brought to the plant. The rags should be placed in the area specifically designated "WASTE DISPOSAL". The rags from both the Quarry and plant should be burned on a weekly basis. Burning will take place by introducing the rags into the kiln at the feed hood.

A monthly report should be submitted, as to the quantity of rags generated and disposed from the plant on the attached form.

Oil Drums: in all cases an effort should be made to have the oil company pick up empty oil drums. If this is not possible, an alternate method of disposal would be as follows:

- 1.) Drain empty oil drum into an approved container for disposal.
- 2.) clean drum out with diesel fuel or hot water to remove oil residue, placing residue in an approved container.
- 3.) store empty drum in the area designated "Empty Drums".
- 4.) when a 10 or more drums have accumulated they should be crushed and placed in the designated "Scrap Metal" area.

A monthly report should be submitted on the attached form, as to the quantity of oil drums disposed from the plant, .

Grease Drums: in all cases an effort should be made to have the oil company pick up empty grease drums or order drums with liners. If this is not possible, an alternate method of disposal would be as follows:

- 1.) clean the grease drum with rags and diesel fuel and place rags and solvent residue into an approved container for disposal.
- 2.) store empty drum in the area designated "Empty Drums".
- 3.) when a 10 or more drums have accumulated they should be crushed and placed in the designated "Scrap Metal" area.

A monthly report should be submitted on the attached form , as to the quantity of grease drums disposed from the plant.

Floor Dry, Oil Absorbent Materials: should be stored in a 1/4 barrel container labeled "Oily Residue". Each container should be brought to the plant and placed in the area designate "Waste Disposal".

A monthly report should be submitted on the attached form, as to the quantity of floor dry and absorbent material disposed from the plant.

Aerosol Containers: this category includes belt dressing cans, paint cans, etc. Every effort should be made to find an environmentally safe alternative product that doesn't use an aerosol spray. However, if no suitable substitutes exist and it is necessary to use an aerosol, the can when empty should be placed in the container labeled "TRASH". This will be handled according to the guideline established under Paper and food wastes.

A monthly report should be submitted on the attached form, as to the quantity of aerosol cans disposed from the plant.

Solvent Wastes

Mineral Spirits and Solvents, "liquid hazardous waste": all non-chlorinated hazardous waste such as mineral spirits and solvent, etc. should be placed in the proper holding tank and emptied periodically into the waste oil tanks located east of the gas house.

A monthly report should be submitted, as to the quantity of oils and solvents disposed from the plant, on the attached form.

Chlorinated Hazardous Wastes: It is our policy to eliminate the use of any chlorinated solvents used at our facility, however should residual material be on site it should be stored in a suitable container which is specifically labeled as to the content of material and arrangements should be made to ship it to an approved waste facility for disposal. Arrangements should be made through Doug Hale.

A monthly report should be submitted, as to the quantity of chlorinated wastes generated or disposed from the plant, on the attached form.

**ASH GROVE CEMENT COMPANY
DURKEE PLANT**

MONTHLY WASTE GENERATION REPORT

Type of Waste	Quantity	Units
Oil Filters		lbs.
Oily Rags		lbs.
Oil/Grease Drums		ea.
Absorbent Material		lbs.
Aerosol Cans		ea.
Oil		gal.
Solvents		gal.
Chlorinated Wastes		gal.